



Department of Energy

Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

May 24, 1999

Mr. Wayne Pierre, Team Leader
Environmental Cleanup Office
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Dean Nygard, Bureau Chief
Idaho Department of Health & Welfare
Division of Environmental Quality
Community Programs
1410 N. Hilton
Boise, Idaho 83706

SUBJECT: Transmittal of the Draft Record of Decision for the Test Area North Operable Unit (OU) 1-10 Comprehensive Remedial Investigation and Feasibility Study (RI/FS) at the Idaho National Engineering and Environmental Laboratory – (OPE-ER-75-99)

Dear Mr. Pierre and Mr. Nygard:

Enclosed for your review is the draft Record of Decision (ROD) for the Test Area North OU 1-10 Comprehensive RI/FS at the INEEL. This submittal meets the enforceable ROD submittal date of May 25, 1999. Also enclosed is the revised V-tank in-situ vitrification cost estimate.

The cost estimate for the V-tank in-situ vitrification (ISV) alternative has been updated to reflect changes in the cost estimate assumptions and to include items that were omitted from the original estimate. The original estimate assumed that LDRs were not an ARAR, that the monolith would be delisted, and that a simple soil cover would be installed. Current assumptions are that LDRs are an ARAR, the monolith will not be delisted, and that RCRA closure and post closure care requirements are ARARs. Changes to the estimate include vitrifying overlying soils and the sand filter, disposing of other contaminated soils at the ICDF, treating and disposing of secondary waste, placing a compacted soil cover over the monolith, monitoring the vadose zone beneath the site, installing heat shields, and relocating buried utilities. The revised cost estimate has increased from \$10.5M to \$15.9M.

The V-tank Land Disposal Restrictions ARAR issue is addressed by explaining that EPA considers vitrification to be a technology-based standard for the V-tanks and that EPA will approve the use of ISV as an alternative to high level vitrification under the provisions of 40 CFR 264.42(b). RCRA landfill closure and post closure care ARARs are also included. The ROD specifies that performing ISV, constructing and maintaining a soil cap, and monitoring the integrity of the cap and the monolith will satisfy the administrative and substantive RCRA closure requirements.

If you have any questions regarding this transmittal, or if you need any additional information, please contact Mark Shaw at (208) 526-6442.

Sincerely,



Kathleen E. Hain, Manager
Environmental Restoration Program

Enclosures

cc: C. Cody, DEQ, 1410 N. Hilton, Boise, ID 83706
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